

**IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN DISTRICT
OF GEORGIA ATLANTA DIVISION**

NEW GEORGIA PROJECT, et al.,
Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,
Defendants.

No. 1:24-cv-03412-SDG

No. 1:24-cv-04287-SDG

No. 1:24-cv-04659-SDG

GEORGIA STATE CONFERENCE OF
THE NAACP, et al.,
Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,
Defendants.

SECURE FAMILIES INITIATIVE
AND THEIR MEMBERS,
Plaintiff,

v.

BRAD RAFFENSPERGER, et al.,
Defendants.

**CONSENTED-TO MOTION FOR LEAVE FOR EXTENSION OF TIME TO
FILE CONSOLIDATED RESPONSE TO ADDITIONAL COUNTIES'
MOTIONS TO DISMISS**

Plaintiffs Georgia State Conference of the NAACP, Georgia Coalition for the People's Agenda, Inc., and VoteRiders (the "Georgia NAACP, People's Agenda, and VoteRiders Plaintiffs") respectfully request a several-day extension of time, until April 7, 2025, to file a consolidated response to Rule 12(b) motions to dismiss filed by nine county defendants who were not parties to the original complaints in this consolidated proceeding.

In support of this motion, Plaintiffs state as follows:

1. On December 17, 2024, Plaintiffs New Georgia Project, Sang Huynh, Georgia Muslim Voter Project, A. Philip Randolph Institute, Georgia State Conference of the NAACP, Georgia Coalition for the People's Agenda, Inc., VoteRiders, and Secure Families Initiative filed their Consolidated Complaint pursuant to this Court's Consolidation Order (ECF 137) and scheduling order (ECF 142).
2. In the Consolidated Complaint, the Georgia NAACP, People's Agenda, and VoteRiders Plaintiffs added the following ten counties, who had not previously been named in any of the original complaints, as defendants¹: Cherokee County Board of Elections and Registrations

¹ In the Consolidated Complaint, Plaintiffs Georgia NAACP and People's Agenda sued Secretary of State Raffensperger, the SEB Defendants, and the boards and members of seventeen counties' boards of elections and registration (the

and its board members (the “Cherokee County Defendants”); Columbia County Board of Elections and its board members (the “Columbia County Defendants”); Dekalb County Board of Registrations and Elections and its board members (the “Dekalb County Defendants”); Dougherty County Board of Elections and its board members (the “Dougherty County Defendants”); Hall County Board of Elections and Registrations and its board members (the “Hall County Defendants”); Lee County Board of Elections and Registrations and its board members (the “Lee County Defendants”); Lowndes County Board of Elections and Registrations and its board members (the “Lowndes County Defendants”); Richmond County Board of Elections and its board members (the “Richmond County Defendants”); Whitfield Worth County Board of Elections and Registrations and its board members (the “Whitfield County

“Seventeen County Board Member Defendants”) with respect to their NVRA claims. Seven of the Seventeen County Board Member Defendants were named as defendants in the original complaint filed by the New Georgia Project Plaintiffs. The ten counties referenced are counties added by Plaintiffs Georgia NAACP and People’s Agenda that were not included in any of the original complaints.

Defendants”); and Worth County Board of Elections and Registrations and its board members (the “Worth County Defendants”).

3. The Georgia NAACP, People’s Agenda, and VoteRiders Plaintiffs, and the newly added county defendants agreed to waiver of service of the Consolidated Complaint and to a March 24, 2025 deadline for the newly added county defendants to respond to the Consolidated Complaint.
4. On February 17, 2025, the newly added Richmond County Defendants filed a Rule 12(b) motion to dismiss (ECF No. 189). Plaintiffs responded to that motion in their consolidated response to various Rule 12(b) motions filed on February 22, 2025 (ECF No. 228).
5. The remaining nine newly added county defendants thereafter filed their own motions to dismiss. Specifically, on March 19, 2025, the Cherokee County and Lee County Defendants filed motions to dismiss (ECF Nos. 249 and 250). On March 21, 2025, the Whitfield County and Columbia County Defendants filed motions to dismiss (ECF Nos. 252-1 and 253). And on March 24, 2025, the Dougherty County, Worth County, Lowndes County, Hall County, and Dekalb

County Defendants filed motions to dismiss (ECF Nos. 254, 255, 256, 257, and 258-1).

6. Local Rule 7.1(B) provides Plaintiffs 14 days to respond to each of the foregoing motions to dismiss, with responses currently due April 2 (to the Cherokee and Lee County motions), April 4 (to the Whitfield and Columbia County motions), and April 7, 2025 (to the Dougherty, Worth, Lowndes, Hall, and Dekalb County motions).
7. The Georgia NAACP, People's Agenda, and VoteRiders Plaintiffs plan to file a single consolidated response addressing the nine motions identified in paragraph 5 above. They requested and obtained the consent of the Cherokee, Columbia, Lee, and Whitfield County Defendants—the newly added counties who filed their Rule 12(b) motions prior to the March 24, 2025 deadline—to seek an extended deadline of April 7, 2025, to file a consolidated response.
8. There is good cause to grant this short extension to permit a consolidated response to the nine motions to dismiss. This extension should not result in prejudice to any party or the Court.
9. Plaintiffs Georgia State Conference of the NAACP, Georgia Coalition for the People's Agenda, Inc., and VoteRiders therefore respectfully request that the Court extend their deadline to respond to the

Cherokee, Columbia, Lee, and Whitfield County Defendants' motions to dismiss to April 7, 2025.

Respectfully submitted this 1st day of April, 2025,

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**Admitted Pro Hac Vice*

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CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2025, I electronically filed the foregoing
MOTION FOR LEAVE FOR EXTENSION OF TIME TO FILE
CONSOLIDATED RESPONSE TO MOTIONS TO DISMISS with the Clerk of
Court using the CM/ECF system which will automatically send email notification
of such filing to all attorneys of record in this matter.

/s/ Lindsey B. Cohan

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